

**IN THE UNITED STATES DISTRICT COURT OF PENNSYLVANIA  
WESTERN DISTRICT, ERIE DIVISION**

ERIE COUNTY ENVIRONMENTAL COALITION, et. al.)	)	
Plaintiffs.	)	<b>CIVIL ACTION NO: 05-59E</b>
	)	
v.	)	
	)	
MILLCREEK TOWNSHIP SEWER AUTHORITY, et. al.)	)	
Defendants.	)	<b>FOR INJUNCTIVE AND</b>
	)	<b>DECLARATORY</b>
	)	<b>RELIEF AND FOR</b>
	)	<b>CIVIL PENALTIES</b>
	)	

**DECLARATION IN SUPPORT OF STANDING**

I, H.P. Lim, do hereby affirm and state:

1. I am a member of **PennEnvironment, Inc.** and have been a member since May 18, 2004. I have personal knowledge of the matters set forth herein, except where they are based upon information and belief.
2. The mission of **PennEnvironment, Inc.** is: PennEnvironment is a citizen-based, non-profit and non-partisan environmental group that combines independent research, practical ideas and tough-minded advocacy to tackle our state's top environmental problems.
3. My present address is 6323 Meadowrue Lane, Erie, PA 16505.
4. I understand that this declaration is to be used in connection with litigation over MillCreek Township and MillCreek Township Sewer Authority's Failure to perform its duties under the Clean Water Act. I am supportive of this litigation.
5. I have used and continue to use Pennsylvania's Waters, including Walnut Creek. Particularly I like to fish in these waters.
6. I enjoy participating in the aforementioned activities approximately 6 times per month.
7. My enjoyment of Walnut Creek has been significantly impacted by MillCreek Township and MillCreek Township Sewer Authority's continuous discharge of significant amounts of raw sewage and/or inadequately treated sewage into Walnut Creek and its surrounding tributaries without a NPDES permit or Pennsylvania water quality management permit in the following ways: Excessive pollution affects the water quality which in turn affects fishing.

**RECEIVED**

**NOV 28 2005**

CLERK U.S. DISTRICT COURT  
WEST DIST. OF PENNSYLVANIA

8. I believe that my loss of enjoyment of Walnut Creek is a direct result of MillCreek Township and MillCreek Township Sewer Authority's failure to ensure that water quality standards are implemented within the township.
9. This Court has the ability to ensure that Pennsylvania's waters are preserved for my use and enjoyment, as well as future generations, by forcing MillCreek Township Sewer Authority and MillCreek Township to comply with the Clean Water Act.

I VERIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND  
CORRECT. EXECUTED ON 11/26/05 (Date).

Theng-Pei Lim

NAME

Theng-Pei Lim